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RICHARD A. LEVINE, ESQ. [SBN: 91671]  
ZACHERY A. LOPES, ESQ. [SBN: 284394]  
BRIAN P. ROSS, ESQ. [SBN 23991]  
RAINS LUCIA STERN ST. PHALLE & SILVER, PC  
1428 2<sup>nd</sup> Street, Suite 200  
Santa Monica, CA 90401  
Telephone: 310.393.1486  
Facsimile: 310.395.5801  
Email: rlevine@rslawyers.com

**FILED**  
Superior Court of California  
County of Los Angeles

DEC 31 2018

Sherri R. Carter, Executive Officer/Clerk  
By: Carmen Del Rio, Deputy  
CARMEN DEL RIO

Attorneys for Petitioner  
LOS ANGELES POLICE PROTECTIVE LEAGUE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES**

CASE NO. **18STCP03495**

LOS ANGELES POLICE PROTECTIVE  
LEAGUE

Petitioner,

v.

CITY OF LOS ANGELES, a municipal  
corporation; MICHEL R. MOORE, Chief of  
Police, City of Los Angeles, and DOES 1  
through 20, inclusive,

Respondents

**NOTICE OF EX PARTE APPLICATION  
BY PETITIONER LOS ANGELES  
POLICE PROTECTIVE FOR  
ALTERNATIVE WRIT OF MANDATE  
AND STAY ORDER;**

**[Unlimited Civil Action]**

**[Application for Alternative Writ of  
Mandate and Stay Order; Memorandum  
of Points and Authorities; Declarations of  
Richard Levine Esq. and Craig Lally and  
Exhibits Thereto; Declaration of Richard  
Levine Esq. Re: Notice of Hearing;  
[Proposed] Alternative Writ of Mandate  
and Stay Order; Proof of Service  
contemporaneously filed herewith]**

**[ C.C.P Section 1085, 1087; Los Angeles  
County Court Rule 3.231 (c)(e)**

**DATE: DECEMBER 31, 2018**

**TIME: 8:30 A.M.**

**DEPT: \_\_\_\_\_ [WRITS AND RECEIVERS]**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

**NOTICE OF EX PARTE APPLICATION BY PETITIONER LOS ANGELES POLICE PROTECTIVE FOR  
ALTERNATIVE WRIT OF MANDATE AND STAY ORDER**

01/02/19


1 PLEASE TAKE NOTICE that on December 31, 2018 at 8:30 a.m. in Department  
2 \_\_\_\_\_ (Writs and Receivers) of the above-entitled Court located at 111 North Hill Street, Los  
3 Angeles, California, Petitioner Los Angeles Police Protective League will apply *ex parte* for an  
4 Alternative Writ of Mandate directing Respondents City of Los Angeles and Police Chief  
5 Michel R. Moore of the Los Angeles Police Department and their agents, employees and  
6 representatives to refrain from retroactively enforcing or taking any steps to retroactively  
7 enforce California Senate Bill 1421, enacted as Chapter 988 of the 2017-2018 Regular Session  
8 ("SB 1421"), effective January 1, 2019 which amends Penal Code sections 832.7 and 832.8  
9 respecting the confidentiality of peace officer personnel records.

10 In addition, Petitioner applies to this Court for a Stay Order prohibiting Respondents  
11 from any retroactive enforcement or application of Senate Bill 1421 pending such return  
12 and hearing on the Alternative Writ of Mandate or until this Court otherwise directs.

13 The Application for an Alternative Writ of Mandate and Stay Order is based on this  
14 Notice together with the contemporaneously filed Memorandum of Points and Authorities in  
15 Support of Application for Alternative Writ of Mandate and Stay Order; Declarations of  
16 Richard A. Levine Esq. and Craig Lally and Exhibits Thereto; Proposed Alternative Writ of  
17 Mandate and Stay Order, Declaration of Richard A. Levine Esq. Re: Notice of Hearing and  
18 Proof of Service.

19 RAINS LUCIA STERN ST. PHALLE & SILVER, PC

20 Dated: 12/26/18

21   
22 Richard A. Levine Esq.  
23 Attorneys for Petitioner  
LOS ANGELES POLICE PROTECTIVE LEAGUE